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Office of the Executive Officer
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September 26, 2006

Ms. Catherine Witherspoon
Executive Officer
California Air Resources Board
1001 I Street
Sacramento CA 95812

Re: Proposed Amendments to the Hexavalent Chromium Airborne Toxic Control Measure (ATCM) for Chrome Plating and Chromic Acid Anodizing Operations

Dear Ms. Witherspoon:

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the State's Proposed Amendments to the Hexavalent Chromium Airborne Toxic Control Measure (ATCM) for Chrome Plating and Chromic Acid Anodizing Operations. This is an important opportunity to reduce emissions of a potent known human carcinogen and to further protect public health.

As you know, seventy-five percent of the state's metal platers are located in the South Coast Air Basin (Basin). These facilities have been subject to SCAQMD Rule 1469 – Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations since May 2003. At the time Rule 1469 was adopted, it was the most aggressive rule for chromium metal plating in the nation, and is more stringent than the current ATCM. Compliance with Rule 1469 has been relatively good. Both Rule 1469 and the proposed changes to the state ATCM can be strengthened.

SCAQMD staff appreciates the work that CARB staff has done over the last 3 years in developing the new proposed changes to the ATCM. These changes represent more stringent controls than Rule 1469. We think that the proposal can be further strengthened by adopting the changes included in the attachment to this letter. Taken as a whole, the changes provide some flexibility for meeting the more stringent emission limits, while better serving the breathing public.

Over the three years of implementing Rule 1469, several important factors have become evident. First, fume suppressants are an effective means to significantly

reduce hexavalent chromium emissions and are an important tool in the overall emission reduction program. Source tests have demonstrated over 99.5 percent reduction, and compliance with in-field testing for surface tension is very high. Second, HEPA filters, which have a rated reduction efficiency of 99.97 percent, are also very effective. Fume suppressants, which are only a half percent lower reduction efficiency as HEPA filters, are a pollution prevention approach because emissions are minimized before they can leave the tank.

However, with HEPA or any control devices, the collection, or capture, efficiency is critical. If a portion of the emissions from the tank do not reach the HEPA system, the overall reductions are lower. Both fume suppressants and add on control devices need increased recordkeeping and more field presence by inspectors to ensure continuous compliance.

The attached suggested amendments to the proposed amendments to the ATCM are offered as a mechanism to improve the already enhanced ATCM proposal. Highlighted areas show where the suggestions are more stringent than the current ATCM proposal. This list of changes is meant to be implemented in total. It offers flexibility for industry to meet the very stringent emission limits in a technology-neutral fashion. The suggested amendments include an expedited compliance schedule, use of fume suppressants before controls are added, additional recordkeeping, periodic source testing, more frequent inspections, and stringent backstop requirements. The proposal will reduce the economic impacts and provide the most health protective ATCM.

The SCAQMD staff respectfully requests addition of the attached enhancements in a 15-day change process. If this is not possible, then a 30-day delay should be sufficient to produce the necessary rule language changes. Thank you for your consideration of these changes. The SCAQMD staff would be pleased to assist your staff in this process. If you have any questions or would like to discuss this further, please call me at (909) 396-3131.

Sincerely,

Barry R. Wallerstein, D.Env.
Executive Officer

BRW:BC:JW
Attachment
cc: CARB Board Members

Attachment

SCAQMD Staff Suggested Amendments to Revision to the Proposed Chrome Plating ATCM

Alternative Proposal

Existing and Modified Facilities

- Control Requirement
  - ≤ 20,000 A-Hr: 0.01 mg/A-Hr
  - > 20,000 and ≤ 200,000 A-Hr: 0.0015 mg/A-Hr (HEPA equivalent)
  - > 200,000 A-Hr: 0.0015 mg/A-Hr (HEPA equivalent)
  - >15 grams per year: 0.0011 mg/A-Hr (HEPA and fume suppressant equivalent or AB2588)*

**0.0011 based on avg of 7 pre-2003 dec chrome source test results for HEPA and fume supp.*

- Backstop
  - HEPA and fume suppressant (0.0011 mg/amp-hours) if:
    - 3 strikes on emissions related violations in any five year period for facilities

- Enhanced Operator Compliance Demonstration
  - Stepped up recordkeeping and maintenance:
    - Daily recording of APC operating parameter, i.e., pressure drop across filters, properly operating nozzles, fan and motor, etc.
    - Conduct and record weekly smoke tests to ensure proper effluent capture efficiency
    - Maintain maintenance records for all related equipment
    - Retain purchase orders for filters and waste manifest for filter disposal for 2 years
  - Design criteria for APC, i.e. sight glass to inspect filters
  - Trained environmental compliance person, (i.e., attended CARB or district course approved by CARB) required at all times

- Enhanced Field Inspections and Compliance Demonstration
  - Complete annual field inspections by air district staff
  - Quarterly field inspections by air district staff, including periodic third party analysis of surface tension (currently facilities conduct daily on-site testing)
  - Source test requirements every 5 years at the air district's discretion
  - Smoke tests to be witnessed by compliance staff upon request
  - Standardized compliance/enforcement guidelines developed jointly by CARB and CAPCOA
  - Establish protocol to address inlet capture efficiency
  - Develop enhanced environmental compliance training classes to be offered by CARB and air districts

Compliance Schedule for Existing Facilities

- Submit compliance plan within 6 months, unless already submitted to local air agency
- ≤ 20,000 amp-hours: 6 months
- >20,000 and ≤200,000 A-Hr, >100 m: 4 years (0.01 mg/A-Hr in interim, after 6 months)
- >20,000 and ≤200,000 A-Hr, ≤100 m: 3 years (0.01 mg/A-Hr in interim, after 6 months)
- >200,000 A-Hr: 2 years (0.01 mg/A-Hr in interim, after 6 months)

New Facilities

- Control requirements:
  - 0.0011 mg/amp-hours (HEPA **and** fume suppressant equivalent)
- Buffer zone:
  - Site 300 meters from area:
    - zoned residential
    - zoned mixed use
    - **add** school or school under construction

Comparison with ATCM

Elements	SCAQMD Rule 1469	Proposed State Chrome ATCM	ATCM with Suggested Amendments
Existing Facilities ≤ 20,000 A-Hr	• 0.01 mg/A-Hr	• 0.01 mg/A-Hr (No foam blanket)	• 0.01 mg/A-Hr (Any approved method)
Existing Facilities >20,000 -≤200,000 A-Hr • Sensitive receptor ≤100 m • Sensitive receptor >100 m	• HEPA if sensitive/ resident < 25m or school <100m • all others 0.01 mg/A-H to 365,000 amp-hr/year	• 0.0015 mg/A-H (2 years) • 0.0015 mg/A-H (5 years)	• 0.0015 mg/A-H (3 years) • 0.01 mg/A-H (interim, 6 mo) • 0.0015 mg/A-H (4 years) • 0.01 mg/A-H (interim, 6 mo)
Existing Facilities >200,000 A-Hr	• 0.01 mg/A-H for < 356,000 A-H/year • 0.0015 mg/A-H for > 365,000 A-H/yr	• 0.0015 mg/A-H must use HEPA (2 years)	• 0.0015 mg/A-H any approved method (2 years)
Existing Facilities >15 g/year	• Compliance w/1469 = Compliance w/AB2588	• AB2588	• 0.0011 mg/A-H (=HEPA and Fume) or AB2588
Buffer zone for new facilities	• No buffer zone requirements. Compliance w/R1401	• 150 meters • Zoned for residential or mixed use	• 300 meters • Add to ATCM school and school under construction
Backstop	• 3 strikes within a 5 year: must install HEPA	• None	• 3 strikes within 5 year: 0.0011 mg/A-H (=HEPA and Fume)
Compliance	• 3 inspections per year if no APC or near school or sensitive receptor (Resolution language)	• Designated to local air agency's policy	• Complete annual inspection • Quarterly inspection • Source tests • Smoke tests • Standardized guidelines with CARB and CAPCOA • Enhanced training classes
Recordkeeping	• Inspection records • Performance tests • Monitoring data • Breakdown/Exceedances • Demon of facility size • Annual A-Hr usage • Fume supp additives • New/modified source review • Housekeeping	• Same	• Same, PLUS • Enhanced daily records for APC operating parameters • Weekly smoke tests • Maintenance records • Purchase orders for filters and waste manifest for disposal
Training	• 2 years	• Same	• At all times, more frequent

Profile of Chrome Plating Facilities in the SCAQMD

Number of facilities

- ~155 chrome plating facilities in SCAQMD
  - ~130 have Rule 1469 Compliance Plans
  - ~ 10 Compliance Plans pending approval

Current controls for chrome platers in the SCAQMD w/ compliance plans

- 50 facilities currently meet HEPA emission limit (0.0015 mg/A-H)
- 62 facilities currently using fume suppressants:
  - ≤20,000 A-H/yr: 12 facilities
  - >20,000 to ≤200,000 A-H/yr: **21 facilities**
    - *≤100 m from sensitive receptor: 14 facilities*
    - *> 100 m from sensitive receptor: 7 facilities*
  - >200,000 A-H/yr: **30 facilities**
- **~6 facilities must upgrade existing control equipment to meet HEPA emission limit**
- Impacts on ~10 facilities w/out compliance plans unknown.